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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO / OAKLAND DIVISION

RENEE FASSBENDER AMOCHAEV,
DEBORAH ORLANDO, KATHRYN N.
VARNER and JUDY WEIL, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

CITIGROUP GLOBAL MARKETS, INC.,
d/b/a SMITH BARNEY,

Defendant.

Case No. C-05-1298 PJH

**JOINT STIPULATION AND [PROPOSED]
ORDER MODIFYING CLASS
CERTIFICATION SCHEDULE**

STIPULATION

WHEREAS, by Order dated September 14, 2005, the Court entered a case management Order setting a class certification briefing schedule ;

WHEREAS, by Order dated March 20, 2006, the Court entered a Stipulation And Order Re Modification Of Class Certification Schedule And Deadline For Completing ADR Process ;

WHEREAS, by its March 20, 2006 Order, the Court modified the schedule by approximately 120 days to facilitate mediation discussions;

WHEREAS, the parties engaged in mediation discussions pursuant to the Court's ADR Process;

WHEREAS, the parties participated in three mediation sessions with the assistance of experienced mediator Hunter R. Hughes;

WHEREAS, the mediation discussions proved unsuccessful, despite the parties' good faith efforts;

WHEREAS, the parties have been conducting discovery diligently throughout this case, however, both (1) ongoing negotiations between the parties concerning document discovery issues in an effort to avoid motion practice and (2) deposition scheduling, including scheduling tied to the production of documents, have necessitated the continuation of class discovery through to the end of September; and

WHEREAS, the proposed modification of the class certification schedule will not unduly delay processing the action,

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, that the parties propose the following schedule for class certification:

| | |
|--------------------------------------------|-----------------------------------|
| Plaintiffs' Motion for Class Certification | October 27, 2006 |
| Defendants' Opposition | December 8, 2006 |
| Plaintiffs' Reply | January 5, 2007 |
| Class Certification Hearing | February 14, 2006 2007 |

1 SO STIPULATED.

2 Dated: August 18, 2006

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5 By: /s/ Heather H. Wong

Heather H. Wong

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1 Dated: August 18, 2006

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8/29/06

The Honorable Phyllis J. Hamilton

